

June 22, 2017

EHS Services and Solutions 110 Wild Basin Road Suite 270 Austin, TX 78746 512.327.2725 bsigroup.com

Air Quality Program
Albuquerque Environmental Health Department
P.O. Box 1293
Albuquerque, NM 87103

Re: Univar USA, Inc. – Albuquerque (AQ) Facility

3301 Edmund St SE Albuquerque, NM 87102

Air Permit Construction Application

To whom it may concern:

In accordance with New Mexico Administrative Code 20.11.41 (20.11.41 NMAC), attached is an application for an air construction permit to authorize proposed hydrochloric acid (HCl) transloading operations in Albuquerque, NM. Operations will involve the transfer of HCl from railcars to tank trucks, totes, and drums; emissions from the operation will be controlled by a water scrubber.

Per the pre-permitting conference call, modeling for this operation is not required, as HCl is not a criteria pollutant nor is it classified as a toxic air pollutant. Finally, onsite roads are paved and emissions have been quantified. Modeling for the resulting particulate matter was not modeled per the determination made during the pre-permit conference call.

Please contact me at 512.717.9416 or via email at jonathan.martin@bsigroup.com if you have any questions or require further information.

Regards,

Reviewed by:

Jonathan Martin

Lindsey Renfro

Jonathan Martin

Lindsey Renfro

Consultant

Principal Consultant

cc: Mr. Gregory Heard, Univar USA, Inc. – Phoenix, AZ

Attachments

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RECEIVED REALTH

BSI Project: 16-2022 Univar AQ Air Construction Permit Letter 062017.docx

List of Attachments

Application for Air Pollutant Sources in Bernalillo County

Permit Application Checklist

Notice of Intent to Construct

Pre-Permit Meeting Request Form

Pre-Permit Application Meeting Checklist

Public Notice of Proposed Air Quality Construction Permit Application

Public Notice Sign Guidelines

Permit Application Review Fee Checklist

Fee Payment Receipt

Process Description

Process Flow Diagram

Area Map

Plot Plan

Emissions Calculations

Annual Emissions Summary

Hydrochloric Acid Emissions Calculations

Hydrochloric Acid Fugitives

Road Emissions Calculations

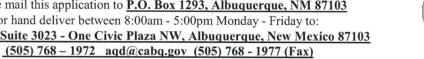
Hydrochloric Acid Safety Data Sheet

Attachments



Albuquerque Environmental Health Department - Air Quality Program

Please mail this application to P.O. Box 1293, Albuquerque, NM 87103 or hand deliver between 8:00am - 5:00pm Monday - Friday to: 3rd Floor, Suite 3023 - One Civic Plaza NW, Albuquerque, New Mexico 87103





Application for Air Pollutant Sources in Bernalillo County Source Registration (20.11.40 NMAC) and Construction Permits (20.11.41 NMAC)

Clearly handwrite or type	Corporate Information	Submittal Date:///
1. Company Name Univar USA, Inc.		
2. Street Address 50 S 45th Ave		Zip_85043
3. Company City Phoenix 4. Compan	y State AZ 5. Company Phone (602) 4	55-4009 6. Company Fax
7. Company Mailing Address: See address above		Zip_60515
8. Company Contact and Title Gregory Heard, Reg	gional Regulatory Manager	9. Phone (602) 455-4009
10. E-mail _ gregory.heard@univarusa.com		
boundar	processes; Location of emission points; Pories	
1. Facility Name_Univar USA, Inc Albuquerque (A	2. Street Address 3301 Edmu	ands Street SE
3. City_Albuquerque 4. State_NM_5	. Facility Phone (505) <u>842-6303</u>	_6. Facility Fax ()
7. Facility Mailing Address (Local) 3301 Edmund St	t SE, Albuquerque, NM	Zip_87102
8. Latitude - Longitude or UTM Coordinates of Facility	ty_35 2' 38.68" N, 106 38' 25.20" W	
9. Facility Contact and Title Gregory Heard, Regional Regulatory Manager		
<u>General Operation Information (if any further infobox)</u>	ormation request does not pertain to your	facility, write N/A on the line or in the
Facility Type (description of your facility operation)	ons) Hydrochloric Acid Transloading	
2. Standard Industrial Classification (SIC 4 digit #)		
3. North American Industry Classification System (N	NAICS Code #)	
4. Is facility currently operating in Bernalillo County If no, planned startup is//	7. No If yes, date of original construction_	
5. Is facility permanent <u>Yes</u> If no, give dates for	r requested temporary operation - from	through/
6. Is facility process equipment new_No If no, g	give actual or estimated manufacture or insta	llation dates in the <u>Process Equipment Table</u> .
 Is application for a modification, expansion, or recexisting facility which will result in a change in enequipment in the <u>Process Equipment Table modification</u> an emission increase. 	missions No . If yes, give the manufacture	re date of modified added or replacement
8. Is facility operation (circle one) [Continuous XIn	termittent Batch]	

9.	Estimated % of production Jan-Mar 25 Apr-Jun 25 Jul-Sep 25 Oct-Dec 25
10.	Current or requested operating times of facility 24 hrs/day 7 days/wk 52 wks/mo 12 mos/yr
11.	Business hrs pm to pm
12.	Will there be special or seasonal operating times other than shown above_No If yes, explain
13.	Raw materials processed Hydrochloric Acid (Transferred, No Processed)
14.	Saleable item(s) produced Hydrochloric Acid
15.]	Permitting Action Being Requested
	☑ New Permit ☐ Permit Modification ☐ Technical Permit Revision ☐ Administrative Permit Revision Current Permit #: Current Permit #: Current Permit #:

PROCESS EQUIPMENT TABLE

(Generator-Crusher-Screen-Conveyor-Boiler-Mixer-Spray Guns-Saws-Sander-Oven-Dryer-Furnace-Incinerator, etc.) Match the Process Equipment Units listed on this Table to the same numbered line if also listed on Emissions & Stack Table (page 6).

Process Equipment Unit	Manufacturer	Model#	Serial #	Manufacture Date	Installation Date	Modification Date	Size or Process Rate (Hp;kW;Btu;ft³;lbs; tons;yd³;etc.)	Fuel Type
Example 1. Generator	Unigen	B-2500	A56732195C- 222	7/96	7/97	N/A	250 Hp - HR. YR.	Diesel
Example 2. Spray Gun	HVLP Systems	Spra –N- Stay 1100	k26-56-95	01/97	11/97	N/A	0.25 gal HR. YR.	Electric Compressor
 HCL Transloading Station 							4,200 Gal HR. 12,138,000 Gal YR.	N/A
2.							HR. YR.	
3.							HR. YR.	
4.							HR. YR.	
5.							HR. YR.	
6.							HR. YR.	B
7.							HR. YR.	
8.							HR. YR.	
9.							HR. YR.	
10.			т.				HR. YR.	
11.							HR. YR.	
12.							HR. YR.	
13.							HR. YR.	
14.							HR. YR.	
15.			· ·			e	HR. YR.	

1. Basis for Equipment Size or Process Rate (Manufacturers data, Field Observation/Test,	etc.)
Submit information for each unit as an attachment	

NOTE: Copy this table if additional space is needed (begin numbering with 16., 17., etc.)

TABLE EXEMPTED SOURCES AND EXEMPTED ACTIVITIES

(Generator-Crusher-Screen-Conveyor-Boiler-Mixer-Spray Guns-Saws-Sander-Oven-Dryer-Furnace-Incinerator, etc.) Match the Process Equipment Units listed on this Table to the same numbered line if also listed on Emissions & Stack Table (page 6).

Process Equipment Unit	Manufacturer	Model#	Serial #	Manufacture Date	Installation Date	Modification Date	Size or Process Rate (Hp;kW;Btu;ft³;lbs; tons;yd³;etc.)	Fuel Type
Example 1. Generator	Unigen	B-2500	A56732195C- 222	7/96	7/97	N/A	250 Hp - HR. YR.	Diesel
Example 2. Spray Gun	HVLP Systems	Spra –N- Stay 1100	k26-56-95	01/97	11/97	N/A	0.25 gal HR. YR.	Electric Compressor
1.							HR. YR.	
2.							HR. YR.	
3.							HR. YR.	
4.							HR. YR.	
5.							HR. YR.	
6.							HR. YR.	
7.							HR. YR.	
8.							HR.	
9.							YR. HR.	
10.							YR.	
11.							YR. HR.	
12.							YR.	
13.							YR. HR.	
14.							YR.	
15.							YR.	
							HR. YR.	

1. Basis for Equipment Size or Process Rate (Manufacturers data, Field Observation/Test, e	etc.)
Submit information for each unit as an attachment	

NOTE: Copy this table if additional space is needed (begin numbering with 16., 17., etc.)

UNCONTROLLED EMISSIONS OF INDIVIDUAL AND COMBINED PROCESSES

(Process potential under physical/operational limitations during a 24 hr/day and 365 day/year = 8,760 hrs)

Process Equipment Unit*	Carbo	n Monoxide (CO)	Oxides of Nitrogen (NOx)	Nonmethane Hydrocarbons NMHC (VOCs)	Oxides of Sulfur (SOx)	Total Suspended Particulate Matter (TSP)	Method(s) used for Determination of Emissions (AP-42, Material balance, field tests, manufacturers data, etc.)
Example	1,	9.1 lbs/hr	27.7 lbs/hr	1.3 lbs/hr	0.5 lbs/hr	2.0 lbs/hr	
1. Generator	1a.	39.9 tons/yr	121.3 tons/yr	5.7 tons/yr	2.2 tons/yr	8.8 tons/yr	AP-42
1.	1.	lbs/hr	lbs/hr	lbs/hr	lbs/hr	lbs/hr	
	1a.	tons/yr	tons/yr	tons/yr	tons/yr	tons/yr	
2.	2.	lbs/hr	lbs/hr	lbs/hr	lbs/hr	lbs/hr	
2.	2a.	tons/yr	tons/yr	tons/yr	tons/yr	tons/yr	
3.	3.	lbs/hr	lbs/hr	lbs/hr	lbs/hr	lbs/hr	
3.	3a.	tons/yr	tons/yr	tons/yr	tons/yr	tons/yr	
4.	4.	lbs/hr	lbs/hr	lbs/hr	lbs/hr	lbs/hr	
٠,	4a.	tons/yr	tons/yr	tons/yr	tons/yr	tons/yr	
5.	5.	lbs/hr	lbs/hr	lbs/hr	lbs/hr	lbs/hr	
3.	5a.	tons/yr	tons/yr	tons/yr	tons/yr	tons/yr	
	6.	lbs/hr	lbs/hr	lbs/hr	lbs/hr	lbs/hr	
6.	6a.	tons/yr	tons/yr	tons/yr	tons/yr	tons/yr	
7.	7.	lbs/hr	lbs/hr	lbs/hr	lbs/hr	lbs/hr	
	7a.	tons/yr	tons/yr	tons/yr	tons/yr	tons/yr	
8.	8.	lbs/hr	lbs/hr	lbs/hr	lbs/hr	lbs/hr	
0.	8a.	tons/yr	tons/yr	tons/yr	tons/yr	tons/yr	
9.	9.	lbs/hr	lbs/hr	lbs/hr	lbs/hr	lbs/hr	
	9a.	tons/yr	tons/yr	tons/yr	tons/yr	tons/yr	
10.	10.	lbs/hr	lbs/hr	lbs/hr	lbs/hr	lbs/hr	
10.	10a.	tons/yr	tons/yr	tons/yr	tons/yr	tons/yr	
Totals of Uncontrolled		lbs/hr	lbs/hr	lbs/hr	lbs/hr	lbs/hr	14.40.43.44
Emissions (1 - 10)		tons/yr	tons/yr	tons/yr	tons/yr	tons/yr	

^{*} If any one (1) of these process units, or combination of units, has an uncontrolled emission greater than (>) 10 lbs/hr or 25 tons/yr for any of the above pollutants (based on 8760 hrs of operation), then a permit will be required. Complete this application along with additional checklist information requested on accompanying instruction sheet. Copy this Table if additional space is needed (begin numbering with 11., 12., etc.)

If your facility does not require a registration or permit, based on above emissions, complete the remainder of this application to determine if a registration or permit would be required for Toxic or Hazardous air pollutants used at your facility.

^{*} If all of these process units, individually <u>and</u> in combination, have an uncontrolled emission less than or equal to (\leq) 10 lbs/hr or 25 tons/yr for all of the above pollutants (based on 8760 hrs of operation), but > 1 ton/yr for any of the above pollutants - then a source registration is required.

CONTROLLED EMISSIONS OF INDIVIDUAL AND COMBINED PROCESSES

(Based on current operations with emission controls OR requested operations with emission controls)

Process Equipment Unit		bon Monoxide (CO)	Oxides of Nitrogen (NOx)	Nonmethane Hydrocarbons NMHC (VOCs)	Oxides of Sulfur (SOx)	d Unit as listed on Unc Total Suspended Particulate Matter (TSP)	Control Method	% Efficiency
Example	1.	9.1 lbs/hr	27.7 lbs/hr	1.3 lbs/hr	0.5 lbs/hr	2.0 lbs/hr	Operating	N/A
1. Generator	1a.	18.2 tons/yr	55.4 tons/yr	2.6 tons/yr	1.0 tons/yr	4.0 tons/yr	Hours	
1. Road Emissions	1.	lbs/hr	lbs/hr	lbs/hr	lbs/hr	0.27 lbs/hr		
1	1a.	tons/yr	tons/yr	tons/yr	tons/yr	0.19 tons/yr		
2.	2.	lbs/hr	lbs/hr	lbs/hr	lbs/hr	lbs/hr		
	2a.	tons/yr	tons/yr	tons/yr	tons/yr	tons/yr		
3.	3.	lbs/hr	lbs/hr	lbs/hr	lbs/hr	lbs/hr		
	3a.	tons/yr	tons/yr	tons/yr	tons/yr	tons/yr		
4.	4.	lbs/hr	lbs/hr	lbs/hr	lbs/hr	lbs/hr		
••	4a.	tons/yr	tons/yr	tons/yr	tons/yr	tons/yr		
5.	5.	lbs/hr	lbs/hr	lbs/hr	lbs/hr	lbs/hr		
	5a.	tons/yr	tons/yr	tons/yr	tons/yr	tons/yr		
6.	6.	lbs/hr	lbs/hr	lbs/hr	lbs/hr	lbs/hr		
0.	6a.	tons/yr	tons/yr	tons/yr	tons/yr	tons/yr		
7.	7.	lbs/hr	lbs/hr	lbs/hr	lbs/hr	lbs/hr		
	7a.	tons/yr	tons/yr	tons/yr	tons/yr	tons/yr		
8.	8.	lbs/hr	lbs/hr	lbs/hr	lbs/hr	lbs/hr		
	8a.	tons/yr	tons/yr	tons/yr	tons/yr	tons/yr		
).	9.	lbs/hr	lbs/hr	lbs/hr	lbs/hr	lbs/hr		
	9a.	tons/yr	tons/yr	tons/yr	tons/yr	tons/yr		
10.	10.	lbs/hr	lbs/hr	lbs/hr	lbs/hr	lbs/hr		
	10a.	tons/yr	tons/yr	tons/yr	tons/yr	tons/yr		
Totals of Controlled		lbs/hr	lbs/hr	lbs/hr	lbs/hr	lbs/hr		
Emissions (1 - 10)		tons/yr	tons/yr	tons/yr	tons/yr	tons/yr		

1. Basis for Control Equipment % Efficiency (Manufacturers data, Field Observation/Test, AP-42, etc.) Submit information for each unit as an attachment
2. Explain and give estimated amounts of any Fugitive Emission associated with facility processes

NOTE: Copy this table if additional space is needed (begin numbering with 16., 17., etc.)

**TOXIC EMISSIONS

VOLATILE, HAZARDOUS, & VOLATILE HAZARDOUS AIR POLLUTANT EMISSION TABLE

Product Categories (Coatings, Solvents, Thinners, etc.)	Volatile Organic Compound (VOC), Hazardous Air Pollutant (HAP), or Volatile Hazardous Air Pollutant (VHAP) Primary To The Representative As Purchased Product	Chemical Abstract Service Number (CAS) Of VOC, HAP, Or VHAP From Representative As Purchased Product	VOC, HAP, Or VHAP Concentration Of Representative As Purchased Product (pounds/gallon, or %)	1. How were Concentrations Determined (CPDS, MSDS, etc.)	Total Product Purchases For Category	(-)	Quantity Of Product Recovered & Disposed For Category	(=)	Total Product Usage For Category	
EXAMPLE 1. Surface Coatings	XYLENE	1330207	4.0 LBS./GAL	MSDS	lbs/yr	(-)	lbs/yr	(=)	lbs/yr	
EXAMPLE	TOLUENE	108883	70%	PRODUCT	100 gal/yr lbs/yr		- 0 - gal/yr lbs/yr		100 gal/yr lbs/yr	
2. Cleaning Solvents				LABEL	200 gal/yr	(-)	50 gal/yr	(=)	150 gal/yr	
I. HCl Transloading	HCI	7647010	37%	SDS	lbs/yr	()	lbs/yr	(-)	lbs/yr	
Station			37 70		12,138,000 gal/yr	(-)	gal/yr	(=)	12,138,000 gal/yr	
II.					lbs/yr	(-)	lbs/yr	(=)	lbs/yr	
	do .		¥)		gal/yr	(-)	gal/yr	(-)	gal/yr	
III.					lbs/yr	()	lbs/yr	(-)	lbs/yr	
					gal/yr	(-)	gal/yr	(=)	gal/yr	
IV.		×			lbs/yr	()	lbs/yr	(-)	lbs/yr	
	e e				gal/yr	(-)	gal/yr	(=)	gal/yr	
V.					lbs/yr	()	lbs/yr	(-)	lbs/yr	
					gal/yr	(-)	gal/yr	(=)	gal/yr	
VI.	/				lbs/yr	()	lbs/yr	(-)	lbs/yr	
					gal/yr	(-)	gal/yr	(=)	gal/yr	
VII.					lbs/yr		lbs/yr	2 %	lbs/yr	
					gal/yr	(-)	gal/yr	(=)	gal/yr	
VIII.					lbs/yr	()	lbs/yr		lbs/yr	
					gal/yr	(-)	gal/yr	(=)	gal/yr	
IX.					lbs/yr		lbs/yr		lbs/yr	
					gal/yr	(-)	gal/yr	(=)	gal/yr	
X.					lbs/yr	()	lbs/yr		lbs/yr	
					gal/yr	(-)	gal/yr	gal/yr	(=)	gal/yr
TOTAL >>>>>>					lbs/yr		lbs/yr	(- N	lbs/yr	
					12,138,000 gal/yr	(-)	gal/yr	(=)	12,138,000 gal/yr	

^{1.} Basis for percent (%) determinations (<u>Certified Product Data Sheets</u>, <u>Material Safety Data Sheets</u>, etc.). Submit, as an attachment, information on one (1) product from each Category listed above which best represents the average of all the products purchased in that Category. Copy this Table if additional space is needed (begin numbering with XI., XII., etc.)

**NOTE: A REGISTRATION IS REQUIRED, AT MINIMUM, FOR ANY AMOUNT OF HAP OR VHAP EMISSION. A PERMIT MAY BE REQUIRED FOR THESE EMISSIONS, DETERMINED ON A CASE-BY-CASE EVALUATION.

Application for Air Pollutant Sources in Bernalillo County Source Registration (20.11.40 NMAC) and Construction Permits (20.11.41 NMAC)

MATERIAL AND FUEL STORAGE TABLE

(Tanks, barrels, silos, stockpiles, etc.) Copy this table if additional space is needed (begin numbering with 6., 7., etc.)

Storage Equipment	Product Stored	Capacity (bbls - tons gal - acres,etc)	Above or Below Ground	Construction (welded, riveted) & Color	Install Date	Loading Rate	Offloading Rate	True Vapor Pressure	Control Equipment	Seal Type	% Eff.
Example 1. Tank	diesel fuel	5,000 gal.	Below	welded/ brown	3/93	3000gal HR. YR.	500 gal HR. YR .	N/A Psia	N/A	N/A	N/A
Example 2. Barrels	Solvent	55 gal Drum	Above - in storage room	welded - green	N/A	N/A HR. YR.	N/A HR. YR.	N/A Psia	N/A	N/A	N/A
1.						HR. YR.	HR. YR.	Psia			
2.						HR. YR.	HR. YR.	Psia			
3.			-	1		HR. YR.	HR. YR.	Psia			
4.						HR. YR.	HR. YR.	Psia			

^{1.} Basis for Loading/Offloading Rate (Manufacturers data, Field Observation/Test, etc.) Submit information for each unit as an attachment

^{2.} Basis for Control Equipment % Efficiency (Manufacturers data, Field Observation/Test, AP-42, etc.) Submit information for each unit as an attachment

STACK AND EMISSION MEASUREMENT TABLE

If any equipment from the Process Equipment Table (Page 2) is also listed in this Stack Table, use the same numbered line for the Process Equipment unit on both Tables to show the association between the Process Equipment and its Stack. Copy this table if additional space is needed (begin numbering with 6., 7., etc.).

Process Equipment	Pollutant (CO,NOx,TSP, Toluene,etc)	Control Equipment	Control Efficiency	Stack Height & Diameter in feet	Stack Temp.	Stack Velocity & Exit Direction	Emission Measurement Equipment Type	Range- Sensitivity- Accuracy-
Example 1. Generator	CO, NOx, TSP, SO ₂ , NMHC	N/A	N/A	18 ft H 0.8 ft D	225 °F	6,000 ft ³ /min - V Exit - upward	N/A	N/A
Example 2. Spray Gun	TSP, xylene, toluene, MIBK	Paint Booth	99% for TSP	9 ft H 0.5 ftD	ambient	10,000 ft³/min - V Exit - horizontal	N/A	N/A
1. HCl Transloading	HCl	Scrubber	99%	To be provided	Ambient	To be provided	N/A	N/A
2.								
3.								
4.							1.0	

I, the undersigned, a responsible officer of the applicant company, certify that to the best of my knowledge, the information stated on this application, together

1. Basis for Control Equipment % Efficiency (Manufacturers data, Field Observation/Test, AP-42, etc.) Submit information for each unit as an attachment

with associated drawings, specifications, and other data, give a true and complete representation of the existing, modified existing, or planned new stationary source with respect to air pollution sources and control equipment. I also understand that any significant omissions, errors, or misrepresentations in these data will be cause for revocation of part or all of the resulting registration or permit.

Signed this 25 th	day of
Gregory T. Heard	Print Title J Regulatory Mgr.
Aceyony 7. Henry	



Environmental Health Department Air Quality Program



Permit Application Checklist

Any person seeking a permit under 20.11.41 NMAC, Authority-to-Construct Permits, shall do so by filing a written application with the Department. Prior to ruling a submitted application complete each application submitted shall contain the required items listed below. **This checklist must be returned with the application.**

Applications that are ruled incomplete because of missing information will delay any determination or the issuance of the permit. The Department reserves the right to request additional relevant information prior to ruling the application complete in accordance with 20.11.41 NMAC.

All applicants shall:

- 2. ↑ Attend the pre-permit application meeting
 a. ☑ Attach a copy of the completed *Pre-permit Application Meeting Checklist* to this application
- 3. Provide public notice to the appropriate parties
 a.

 Attach a copy of the completed Notice of Intent to Construct form to this form
 i. Neighborhood Association(s):

 San Jose NA, South Valley Coalition of NAs
 ii. Coalition(s):

 Mountain View NA, South Valley Alliance, Mountain View Community Action
 - b. Attach a copy of the completed Public Sign Notice Guideline form
- 4. Fill out and submit the *Permit Application*. All applications shall:
 - A.

 Be made on a form provided by the Department. Additional text, tables, calculations or clarifying information may also be attached to the form.
 - B.

 at the time of application, include documentary proof that all applicable permit application review fees have been paid as required by 20 NMAC 11.02. Please refer to the attached permit application worksheet.
 - C. \boxtimes contain the applicant's name, address, and the names and addresses of all other owners or operators of the emission sources.

- D. \boxtimes contain the name, address, and phone number of a person to contact regarding questions about the facility.
- E.

 indicate the date the application was completed and submitted
- F. \boxtimes contain the company name, which identifies this particular site.
- G.

 contain a written description of the facility and/or modification including all operations affecting air emissions.
- H. \boxtimes contain the maximum and standard operating schedules for the source after completion of construction or modification in terms of hours per day, days per week, and weeks per year.
- I. Provide sufficient information to describe the quantities and nature of any regulated air contaminant (including any amount of a hazardous air pollutant) that the source will emit during:
 - Normal operation
 - Maximum operation
 - Abnormal emissions from malfunction, start-up and shutdown
- J. include anticipated operational needs to allow for reasonable operational scenarios to avoid delays from needing additional permitting in the future.
- K. \boxtimes contain a map, such as a 7.5-minute USGS topographic quadrangle, showing the exact location of the source; and include physical address of the proposed source.
- L. 🖰 contain an aerial photograph showing the proposed location of each process equipment unit involved in the proposed construction, modification, relocation, or technical revision of the source except for federal agencies or departments involved in national defense or national security as confirmed and agreed to by the department in writing.
- N.

 include the four digit Standard Industrialized Code (SIC) and the North American Industrial Classification System (NAICS).
- O. Exercise contain the types and potential emission rate amounts of any regulated air contaminants the new source or modification will emit. Complete appropriate sections of the application; attachments can be used to supplement the application, but not replace it.
- P. contain the types and **controlled** amounts of any regulated air contaminants the new source or modification will emit. Complete appropriate sections of the application; attachments can be used to supplement the application, but not replace it.

Q. contain the basis or source for each emission rate (include the manufacturer's specification sheets, AP-42 Section sheets, test data, or other data when used as the R. X contain all calculations used to estimate potential emission rate and controlled emissions. S. contain the basis for the estimated control efficiencies and sufficient engineering data for verification of the control equipment operation, including if necessary, design drawings, test reports, and factors which affect the normal operation (e.g. limits to normal operation). T. contain fuel data for each existing and/or proposed piece of fuel burning equipment. U. X contain the anticipated maximum production capacity of the entire facility and the requested production capacity after construction and/or modification. V. X contain the stack and exhaust gas parameters for all existing and proposed emission stacks. provide an ambient impact analysis using a atmospheric dispersion model approved W. by the US Environmental Protection Agency (EPA), and the Department to demonstrate compliance with the ambient air quality standards for the City of Albuquerque and Bernalillo County (See 20.11.01 NMAC). If you are modifying an existing source, the modeling must include the emissions of the entire source to demonstrate the impact the new or modified source(s) will have on existing plant emissions. X. X contain a preliminary operational plan defining the measures to be taken to mitigate source emissions during malfunction, startup, or shutdown. Y. X contain a process flow sheet, including a material balance, of all components of the facility that would be involved in routine operations. Indicate all emission points, including fugitive points. Z. contain a full description, including all calculations and the basis for all control efficiencies presented, of the equipment to be used for air pollution control. This shall include a process flow sheet or, if the Department so requires, layout and assembly drawings, design plans, test reports and factors which affect the normal equipment operation, including control and/or process equipment operating limitations. AA. contain description of the equipment or methods proposed by the applicant to be used for emission measurement. BB. be signed under oath or affirmation by a corporate officer, authorized to bind the company into legal agreements, certifying to the best of his or her knowledge the

truth of all information submitted.



Notice of Intent to Construct



Under 20.11.41.13B NMAC, the owner/operator is required to provide public notice by certified mail or electronic mail to the designated representative(s) of the recognized neighborhood associations and recognized coalitions that are with-in one-half mile of the exterior boundaries of the property on which the source is or is proposed to be located if they propose to construct or establish a new facility or make modifications to an existing facility that is subject to 20.11.41 NMAC – Construction Permits. A copy of this form must be included with the application.

Applicant's Name and Address: Mr. Greg Heard

Regional Regulatory Manager

50 S. 45th Ave Phoenix, AZ 85043

Owner / Operator's Name and Address: Univar USA, Inc.

3301 Edmunds Street SE Albuquerque, NM 87102

Actual or Estimated Date the Application will be submitted to the Department: April 2017

Exact Location of the Source or Proposed Source:

Description of the Source: Hydrochloric acid transloading operation that will controlled by a water scrubber

Nature of the Business: Chemical terminal

Process or Change for which the permit is requested: Hydrochloric acid transloading operation that will controlled by a water scrubber

Preliminary Estimate of the Maximum Quantities of each regulated air contaminant the source will emit:

Net Changes In Emissions

Initial Construction Permit

(Only for permit Modifications or Technical Revisions)

	THE COMMITTEE OF THE CO		(Omj	for permit ivio	diffications of Teemin	icai icevisions)
	Pounds Per Hour (lbs/hr)	Tons Per Year (tpy)		lbs/hr	tpy	Estimated Total TPY
CO			СО	+/-	+/-	2
NOx			NOx	+/-	+/-	
SO2			SO2	+/-	+/-	
VOC			VOC	+/-	+/-	
TSP	0.27	0.10	TSP	+/-	+/-	
15P	0.27	0.19	PM10	+/-	+/-	
PM10	0.05	0.04	PM2.	1.7		
PM2.5	0.01	0.01	5	+/-	+/-	
VHAP	0.43	1.59	VHA P	+/-	+/-	

Maximum Operating Schedule: Site - 8,760 hr/hr, Source - 2,890 hr/hr

Ver.11/13

City of Albuquerque- Environmental Health Department Air Quality Program- Permitting Section

Phone: (505) 768-1972

Email: aqd@cabq.gov

Normal Operating Schedule: Source - 2,890 hr/hr

Current Contact Information for Comments and Inquires:

Name: Mr. Greg Heard

Address: 50 S. 45th Ave, Phoenix, AZ 85043

Phone Number: (602) 455-4009

E-Mail Address: gregory.heard@univar.com

If you have any comments about the construction or operation of the above facility, and you want your comments to be made as part of the permit review process, you must submit your comments in writing to the address below:

Environmental Health Manager

Stationary Source Permitting

Albuquerque Environmental Health Department

Air Quality Program

PO Box 1293

Albuquerque, New Mexico 87103

(505) 768-1972

Other comments and questions may be submitted verbally.

Please refer to the company name and facility name, as used in this notice or send a copy of this notice along with your comments, since the Department may not have received the permit application at the time of this notice. Please include a legible mailing address with your comments. Once the Department has performed a preliminary review of the application and its air quality impacts, if required, the Department's notice will be published in the legal section of the Albuquerque Journal and mailed to neighborhood associations and neighborhood coalitions near the facility location or near the facility proposed location.

Ver.11/13

City of Albuquerque- Environmental Health Department Air Quality Program- Permitting Section Phone: (505) 768-1972 Email: aqd@cabq.gov





Pre-Permit Application Meeting Request Form

Air Quality Program- Environmental Health Department

Please complete appropriate boxes and email to aqd@cabq.gov or mail to:

Environmental Health Department Air Quality Program P.O. Box 1293 Room 3047 Albuquerque, NM 87103

Name:	Gregory Heard
Company/Organization:	Univar USA, Inc.
Point of Contact:	Phone: (602) 455-4009
(phone number and email):	
Preferred form of contact (circle one): Phone E-mail X	Email: gregory.heard@univar.com
Preferred meeting date/times:	Available Monday – Thursday / 10AM – 2 PM
Description of Project:	Univar USA, Inc. (Univar) proposes to conduct rail-to-truck transloading of hydrochloric acid (HCl).
	Univar requests to conduct the pre-permit meeting by phone.
	Please note that Univar USA, Inc. has employed BSI EHS Services and Solutions (BSI) as the consultant for handling this permitting matter. Jonathan Martin of BSI will be the contact for permitting questions and will be in attendance for the prepermitting meeting. His contact information is below:
	Phone: (512) 717-9416 Email: jonathan.martin@bsigroup.com

City of Albuquerque- Environmental Health Department Air Quality Program- Permitting Section

Phone: (505) 768-1972

Email: aqd@cabq.gov



Environmental Health Department Air Quality Program



Pre-Permit Application Meeting Checklist

Any person seeking a permit under 20.11.41 NMAC, Authority-to-Construct Permits, shall do so by filing a written application with the Department. Prior to submitting an application, the applicant shall contact the department in writing and request a pre-application meeting for information regarding the contents of the application and the application process. This checklist is provided to aid the applicant and a copy must be submitted with the application.

Applications that are ruled incomplete because of missing information will delay any determination or the issuance of the permit. The Department reserves the right to request additional relevant information prior to ruling the application complete in accordance with 20.11.41 NMAC.

Name:	_Greg I	Heard
Contac	t:_(602)	455-4009 / gregory.heard@univar.com
Compa	ny/Busi	ness: Univar USA, Inc.
	Fill out	and submit a Pre-Permit Application Meeting Request form
	\Rightarrow	Available online at http://www.cabq.gov/airquality
X		on Factors and Control Efficiencies U.S. Environmental Protection Agency AP-42, Chapter 5.2 was used to develop the emission factors. The proposed water scrubber will have a control efficiency of 99% for hydrochloric acid (HCl).
		persion modeling guidelines and protocol It is the understanding of Univar USA, Inc. that HCl is not a pollutant that requires air dispersion modeling according to the rules set by New Mexico and Albuquerque-Bernalillo County Air Quality Control Board. Univar USA, Inc. also understands that emission from paved roads do no require modeling.
	Departr Notes:	ment Policies
Ver 11/	12	

Ver. 11/13

X	Air quality permit fees Notes:
	Public notice requirements ■ Replacement Part 41 Implementation ○ □ 20.11.41.13 B. Applicant's public notice requirements ■ Providing public notice to neighborhood association/coalitions ● Neighborhood association: San Jose NA, South Valley Coalition of NA ● Coalition: Mountain View NA, South Valley Alliance, Mountain View Community Action Notes:
	Posting and maintaining a weather-proof sign Notes:
X	Regulatory timelines 30 days to rule application complete 90 days to issue completed permit Additional time allotted if there is significant public interest and/or a significant air

Notes:

quality issue

Public Information HearingComplex permitting action

SUBJECT: Public Notice of Proposed Air Quality Construction Permit Application

Dear Neighborhood Association/Coalition Representative(s),

Why did I receive this public notice?

You are receiving this notice in accordance with New Mexico Administrative Code (NMAC) 20.11.41.13.B(1) which requires any applicant seeking an Air Quality Construction Permit pursuant to 20.11.41 NMAC to provide public notice by certified mail or electronic mail to the designated representative(s) of the recognized neighborhood associations and recognized coalitions that are within one-half mile of the exterior boundaries of the property on which the source is or is proposed to be located.

What is the Air Quality Permit application review process?

The City of Albuquerque, Environmental Health Department, Air Quality Program (Program) is responsible for the review and issuance of Air Quality Permits for any stationary source of air contaminants within Bernalillo County. Once the application is received, the Program reviews each application and rules it either complete or incomplete. Complete applications will then go through a 30-day public comment period. Within 90 days after the Program has ruled the application complete, the Program shall issue the permit, issue the permit subject to conditions, or deny the requested permit or permit modification. The Program shall hold a Public Information Hearing pursuant to 20.11.41.15 NMAC if the Director determines there is significant public interest and a significant air quality issue is involved.

What do I need to know about this proposed application?

THE WOLL THEER TO WHOT WO	out this proposed application.
Applicant Name	Univar USA, Inc.
Site or Facility Name	Univar USA, Inc. – Albuquerque (AQ) Facility
Site or Facility Address	3301 Edmunds Street SE
New or Existing Source	NEW
Anticipated Date of Application Submittal	April 28, 2017
Summary of Proposed Source to Be Permitted	The application is to construct a hydrochloric acid transloading operation that will be controlled using a scrubber with a design emissions reduction efficiency of 99%. The proposed operation will be limited to no more than 2,890 hours per year.

What emission limits and operating schedule are being requested? See attached Notice of Intent to Construct form for this information.

How do I get additional information regarding this proposed application?

For inquiries regarding the proposed source, contact:

- Greg Heard, Regional Regulatory Manager
- gregory.heard@univarusa.com
- (602) 455-4009

For inquiries regarding the air quality permitting process, contact:

- City of Albuquerque Environmental Health Department Air Quality Program
- aqd@cabq.gov
- (505) 768-1972



Environmental Health Department Air Quality Program

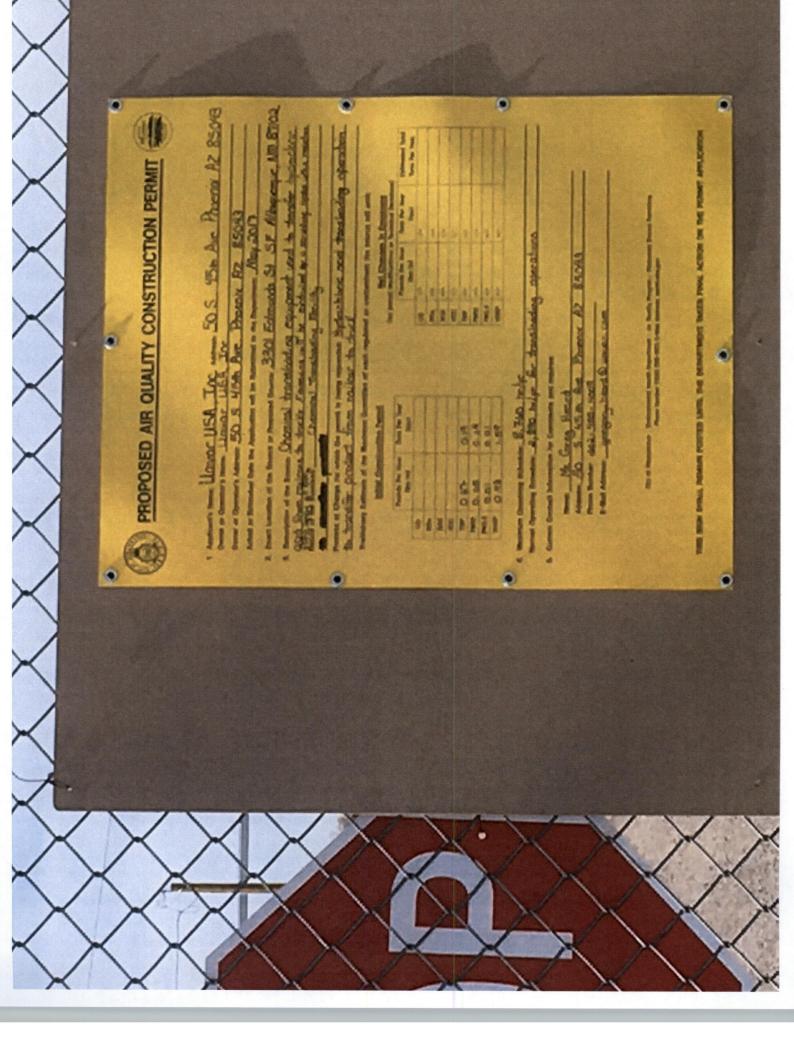


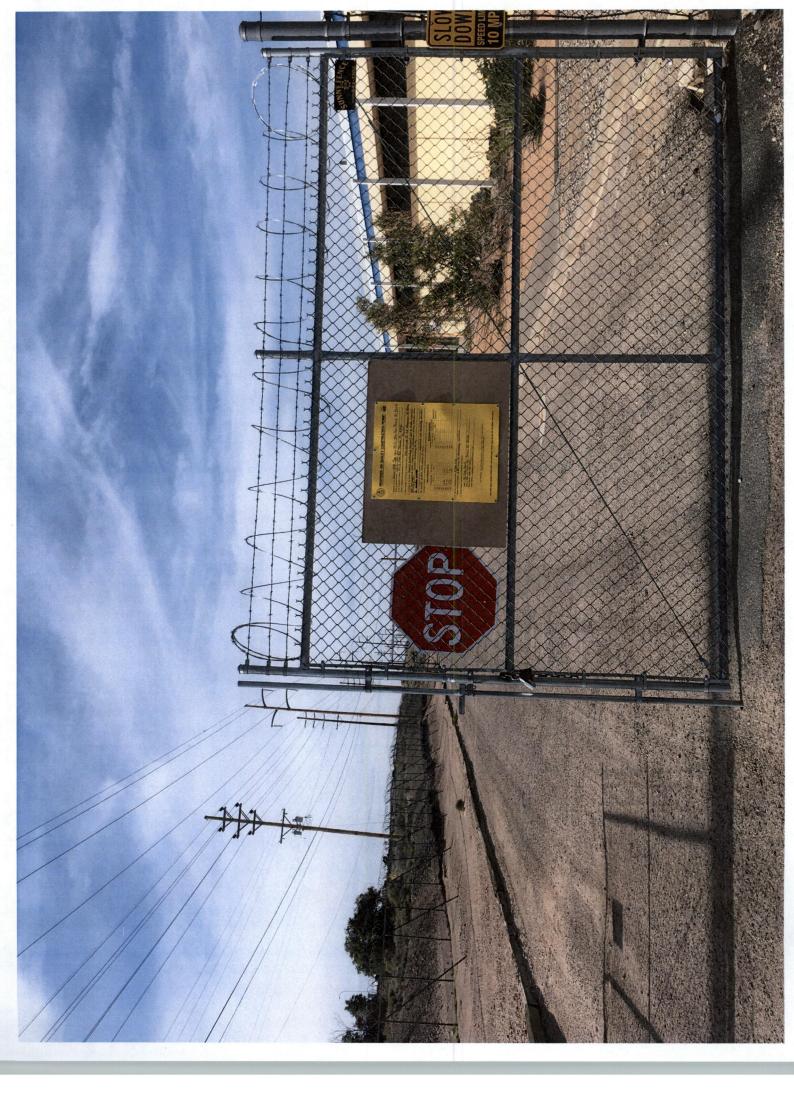
Public Notice Sign Guidelines

Any person seeking a permit under 20.11.41 NMAC, Authority-to-Construct Permits, shall do so by filing a written application with the Department. Prior to submitting an application, the applicant shall post and maintain a weather-proof sign provided by the department. The applicant shall keep the sign posted until the department takes final action on the permit application; if an applicant can establish to the department's satisfaction that the applicant is prohibited by law from posting, at either location required, the department may waive the posting requirement and may impose different notification requirements. A copy of this form must be submitted with your application.

Applications that are ruled incomplete because of missing information will delay any determination or the issuance of the permit. The Department reserves the right to request additional relevant information prior to ruling the application complete in accordance with 20.11.41 NMAC.

Name:	\underline{M}	r. Greg Heard
Contac	ct:_g	regory.heard@univarusa.com
Compa	any/]	Business: _Univar USA, Inc.
		The sign must be posted at the more visible of either the proposed or existing facility rance (or, if approved in advance and in writing by the department, at another location on the perty that is accessible to the public)
		The sign shall be installed and maintained in a condition such that members of the public can easily view, access, and read the sign at all times.
		The lower edge of the sign board should be mounted a minimum of 2' above the existing ground surface to facilitate ease of viewing
	Х	Attach a picture of the completed, properly posted sign to this document
	Alto	Check here if the department has waived the sign posting requirement. ernative public notice details:







Environmental Health Department Air Quality Program



Permit Application Review Fee Instructions

All source registration, authority-to-construct, and operating permit applications for stationary or portable sources shall be charged an application review fee according to the fee schedule in 20.11.2 NMAC. These filing fees are required for both new construction, reconstruction, and permit modifications applications. Qualified small businesses as defined in 20.11.2 NMAC may be eligible to pay one-half of the application review fees and 100% of all applicable federal program review fees.

Please fill out the permit application review fee checklist and submit with a check or money order payable to the "City of Albuquerque Fund 242" and either:

- be delivered in person to the Albuquerque Environmental Health Department, 3rd floor, Suite 3023 or Suite 3027, Albuquerque-Bernalillo County Government Center, south building, One Civic Plaza NW, Albuquerque, NM or,
- mailed to Attn: Air Quality Program, Albuquerque Environmental Health Department, P.O. Box 1293, Albuquerque, NM 87103.

The department will provide a receipt of payment to the applicant. The person delivering or filing a submittal shall attach a copy of the receipt of payment to the submittal as proof of payment. Application review fees shall not be refunded without the written approval of the manager. If a refund is requested, a reasonable professional service fee to cover the costs of staff time involved in processing such requests shall be assessed. Please refer to 20.11.2 NMAC (effective January 10, 2011) for more detail concerning the "Fees" regulation as this checklist does not relieve the applicant from any applicable requirement of the regulation.



Environmental Health Department Air Quality Program Permit Application Review Fee Checklist



Please completely fill out the information in each section. Incompleteness of this checklist may result in the Albuquerque Environmental Health Department not accepting the application review fees. If you should have any questions concerning this checklist, please call 768-1972.

I. COMPANY INFORMATION:

Company Name	Univar USA, Inc.				
Company Address	3075 Highland Parkway, Ste. 200	3075 Highland Parkway, Ste. 200			
Facility Name	Univar USA, Inc Albuquerque (A	AQ) Facility			
Facility Address	3301 Edmunds St SE				
Contact Person	Green Heard Designal Designations Manager				
Contact Person Phone Number (602) 455-4009					
Are these application review fees for located within the City of Albuquero	보고 있는데 경기를 받는데 함께 있는데 보고 있는데 하는데 하는데 하는데 하는데 하는데 하는데 하는데 하는데 하는데 하	Yes	x No		
If yes, what is the permit number as	sociated with this modification?	Permit #			
Is this application review fee for a Q 20.11.2 NMAC? (See Definition of Q	ualified Small Business as defined in ualified Small Business on Page 4)	Yes	× No		

II. STATIONARY SOURCE APPLICATION REVIEW FEES:

If the application is for a new stationary source facility, please check all that apply. If this application is for a modification to an existing permit please see Section III.

Check All That Apply	Stationary Sources	Review Fee	Program Element
	Stationary Source Review Fees (Not Based on Proposed Allowable Emission	Rate)	
	Source Registration required by 20.11.40 NMAC	\$ 549.00	2401
	A Stationary Source that requires a permit pursuant to 20.11.41 NMAC or other board regulations and are not subject to the below proposed allowable emission rates	\$ 1,097.00	2301
	Not Applicable	See Sections Below	
Stationa	ary Source Review Fees (Based on the Proposed Allowable Emission Rate for the single	e highest fee po	llutant)
X	Proposed Allowable Emission Rate Equal to or greater than 1 tpy and less than 5 tpy	\$ 823.00	2302
2	Proposed Allowable Emission Rate Equal to or greater than 5 tpy and less than 25 tpy	\$ 1,646.00	2303
	Proposed Allowable Emission Rate Equal to or greater than 25 tpy and less than 50 tpy	\$ 3,291.00	2304
	Proposed Allowable Emission Rate Equal to or greater than 50 tpy and less than 75 tpy	\$ 4,937.00	2305
	Proposed Allowable Emission Rate Equal to or greater than 75 tpy and less than 100 tpy	\$ 6,582.00	2306
	Proposed Allowable Emission Rate Equal to or greater than 100 tpy	\$8,228.00	2307
	Not Applicable	See Section Above	
	Federal Program Review Fees (In addition to the Stationary Source Application Review	ew Fees above)	
	40 CFR 60 - "New Source Performance Standards" (NSPS)	\$ 1,097.00	2308
	40 CFR 61 - "Emission Standards for Hazardous Air Pollutants (NESHAPs)	\$ 1,097.00	2309
	40 CFR 63 - (NESHAPs) Promulgated Standards	\$ 1,097.00	2310
	40 CFR 63 - (NESHAPs) Case-by-Case MACT Review	\$ 10,971.00	2311
	20.11.61 NMAC, Prevention of Significant Deterioration (PSD) Permit	\$ 5,485.00	2312
	20.11.60 NMAC, Non-Attainment Area Permit	\$ 5,485.00	2313
	Not Applicable	Not Applicable	

III. MODIFICATION TO EXISTING PERMIT APPLICATION REVIEW FEES:

If the permit application is for a modification to an existing permit, please check all that apply. If this application is for a new stationary source facility, please see Section II.

Check All That Apply	Modifications	Review Fee	Program Element
	Modification Application Review Fees (Not Based on Proposed Allowable Emission	n Rate)	
	Proposed modification to an existing stationary source that requires a permit pursuant to 20.11.41 NMAC or other board regulations and are not subject to the below proposed allowable emission rates	\$ 1,097.00	2321
	Not Applicable	See Sections Below	
	Modification Application Review Fees (Based on the Proposed Allowable Emission Rate for the single highest fee pollu	itant)	
	Proposed Allowable Emission Rate Equal to or greater than 1 tpy and less than 5 tpy	\$ 823.00	2322
	Proposed Allowable Emission Rate Equal to or greater than 5 tpy and less than 25 tpy	\$ 1,646.00	2323
	Proposed Allowable Emission Rate Equal to or greater than 25 tpy and less than 50 tpy	\$ 3,291.00	2324
	Proposed Allowable Emission Rate Equal to or greater than 50 tpy and less than 75 tpy	\$ 4,937.00	2325
	Proposed Allowable Emission Rate Equal to or greater than 75 tpy and less than 100 tpy	\$ 6,582.00	2326
	Proposed Allowable Emission Rate Equal to or greater than 100 tpy	\$ 8,228.00	2327
	Not Applicable	See Section Above	
	Major Modifications Review Fees (In addition to the Modification Application Review	Fees above)	
	20.11.60 NMAC, Permitting in Non-Attainment Areas	\$ 5,485.00	2333
	20.11.61 NMAC, Prevention of Significant Deterioration	\$ 5,485.00	2334
	Not Applicable	Not Applicable	
(This se	Federal Program Review Fees ction applies only if a Federal Program Review is triggered by the proposed modificatio addition to the Modification and Major Modification Application Review Fees a	on) (These fee bove)	s are in
	40 CFR 60 - "New Source Performance Standards" (NSPS)	\$ 1,097.00	2328
	40 CFR 61 - "Emission Standards for Hazardous Air Pollutants (NESHAPs)	\$ 1,097.00	2329
	40 CFR 63 - (NESHAPs) Promulgated Standards	\$ 1,097.00	2330
	40 CFR 63 - (NESHAPs) Case-by-Case MACT Review	\$ 10,971.00	2331
	20.11.61 NMAC, Prevention of Significant Deterioration (PSD) Permit	\$ 5,485.00	2332
×	20.11.60 NMAC, Non-Attainment Area Permit	\$ 5,485.00	2333
	Not Applicable	Not Applicable	

IV. ADMINISTRATIVE AND TECHNICAL REVISION APPLICATION REVIEW FEES:

If the permit application is for an administrative or technical revision of an existing permit issued pursuant to 20.11.41 NMAC, please check one that applies.

Check One	Revision Type	Review Fee	Program Element
The state of the s	Administrative Revisions	\$ 250.00	2340
	Technical Revisions	\$ 500.00	2341
	Not Applicable	See Sections II, III or V	

V. PORTABLE STATIONARY SOURCE RELOCATION FEES:

If the permit application is for a portable stationary source relocation of an existing permit, please check one that applies.

Check One	Portable Stationary Source Relocation Type	Review Fee	Program Element
	No New Air Dispersion Modeling Required	\$ 500.00	2501
	New Air Dispersion Modeling Required	\$ 750.00	2502
	Not Applicable	See Sections II, III or V	

VI. Please submit a check or money order in the amount shown for the total application review fee.

Section Totals	Review Fee Amount
Section II Total	\$ 823
Section III Total	\$
Section IV Total	\$
Section V Total	\$
Total Application Review Fee	\$

I, the undersigned, a responsible official of the applicant company, certify that to the best of my knowledge, the information stated on this checklist, give a true and complete representation of the permit application review fees which are being submitted. I also understand that an incorrect submittal of permit application reviews may cause an incompleteness determination of the submitted permit application and that the balance of the appropriate permit application review fees shall be paid in full prior to further processing of the application.

Signed this 25th day of April 2017

Greg Heard Regional Regulatory Manager

Print Name Print Title

Acres 1 Hours Signature

Definition of Qualified Small Business as defined in 20.11.2 NMAC:

"Qualified small business" means a business that meets all of the following requirements:

(1) a business that has 100 or fewer employees;

(2) a small business concern as defined by the federal Small Business Act;

(3) a source that emits less than 50 tons per year of any individual regulated air pollutant, or less than 75 tons per year of all regulated air pollutants combined; and

(4) a source that is not a major source or major stationary source.

Note: Beginning January 1, 2011, and every January 1 thereafter, an increase based on the consumer price index shall be added to the application review fees. The application review fees established in Subsection A through D of 20.11.2.18 NMAC shall be adjusted by an amount equal to the increase in the consumer price index for the immediately-preceding year. Application review fee adjustments equal to or greater than fifty cents (\$0.50) shall be rounded up to the next highest whole dollar. Application review fee adjustments totaling less than fifty cents (\$0.50) shall be rounded down to the next lowest whole dollar. The department shall post the application review fees on the city of Albuquerque environmental health department air quality program website.

1-30 Days 823.00

Date:

Office: ANNEX

==========

Batch: 8228

11:31 AM

0085

Air Quality Programs Environmental Health Department City of Albuquerque

ENVIRONMENTA

Univar USA, Inc. - Albuquerque Facility

voice ID : IN0006402	Facility	Facility ID: FA0004457	A/R ID: AR0003812
ite Permit#	Description		
16/2017 3324	Univar USA, Inc.	3301 EDMUNDS AVE SE -S	Univar USA, Inc. 3301 EDMUNDS AVE SE -STATIONARY SOURCE REVIEW

Due Date:

6/16/2017

Total Due for This Invoice:

FEE 1-5

\$823.00 Amount

\$823.00

\$823.00

When you provide a check as payment, you authorize us either to use information from your check to make a one-time electronic fund transfer (ACH) from

NOTICE TO CUSTOMERS:

your account or to process the payment as a check transaction.

Account#:0003812 Air Quality Payment

Air Quality Receipt #00431237

Cashier: E29569

Tran #: 25

Payment Total:

\$823.00

Transaction Total: MastCard Tendered:

6/21/2017

\$823.00 \$823.00

Thank you for your payment. Have a nice day!

Univar USA, Inc. – Albuquerque Facility Process Description

The Univar USA, Inc. – Albuquerque Facility (Univar) is a chemical distribution facility that purchases chemical products from various manufacturers for resale to industrial users. Operations at the site will be performed 8,760 hours per year (hr/yr), however, transloading operations will be limited to 2,890 hr/yr.

Transloading

The facility is used to transload hydrochloric acid (HCl) from railcars to tank trucks or to totes/drums. Trucks are loaded using submerged or bottom fill methods. Each tank truck loaded at the site is leak checked and certified annually in accordance with Title 49 Code of Federal Regulations (CFR) §180.407, for pressure tank trucks rated at 15 psig or greater. All transloading operations are vented to a water scrubber (Emission Point Number [EPN] WS) with a design control efficiency of 99%.

EPN	Description	Maximum Loading Rate (gal/hr)	Hours of Transloading Operations* (hr/yr)
WC	Railcar-to-Truck Transloading Station	4,200	2.000
WS	WS Railcar-to-Tote/Drums Transloading Station	4,200	2,890

^{*} Actual annual hours of transloading operations do not include pre/post loading set up time.

Fugitive Emissions

Fugitive emissions from pumps, valves, and other components at the site are predicted to be less than 10 tons per year; therefore, no Leak Detection and Repair (LDAR) program is proposed for the site.

Malfunction, Start-Up, and Shutdown

Transloading operations will not take place during periods when the scrubber is undergoing maintenance. Start-up and shutdown operations will be controlled using the scrubber and are not expected to be higher than those of normal operations.

Road Emissions

The paved road in the facility will have tank truck traffic that can result in particulate matter (PM) emissions. Univar does not propose any additional controls or control techniques to control PM beyond the existing road pavement.

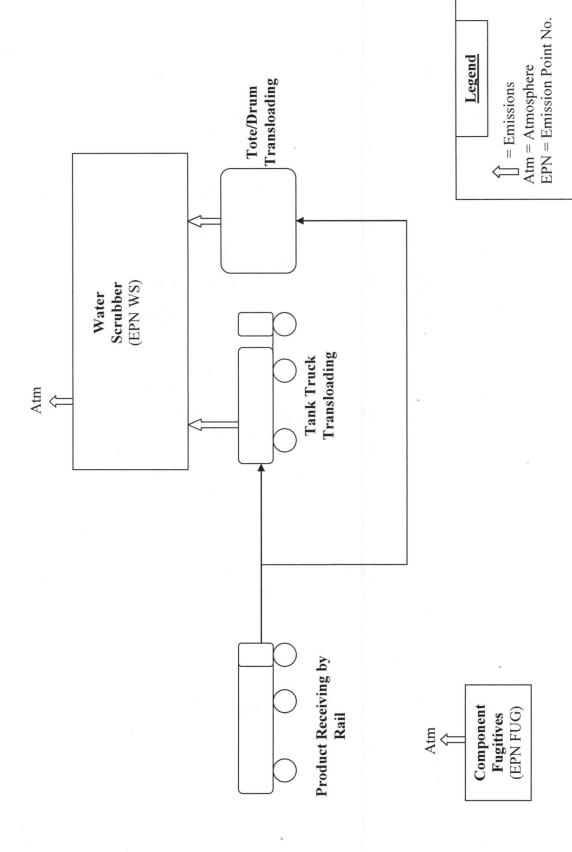
Total Emissions

Emissions from the site are summed below and include those from transloading operations and from equipment fugitives.

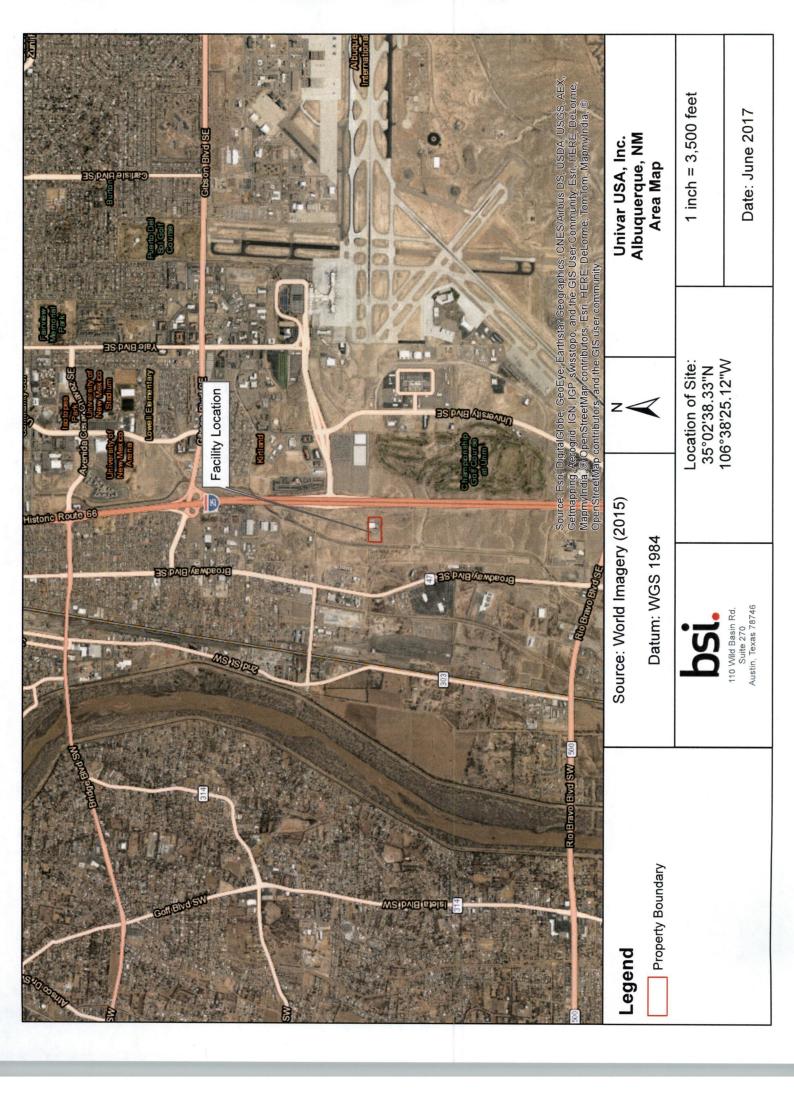
Univar USA, Inc. – Albuquerque Facility Process Description

EPN	Description	Annual Potential-to- Emit (tpy)	Proposed Annual Throughput (gal/yr)	Annual Proposed Emissions (tpy)
WS	Total Transloading Operations	18.86	12,138,000	0.06
FUG	Fugitives	1.53		1.53
RD-1	Road Emissions	0.19		0.19

EPN WS combines all operations from tank truck and tote/drum transloading.



Univar USA, Inc. – Albuquerque Facility Process Flow Diagram





Univar USA, Inc. - Albuquerque Facility Annual Emissions Summary

EPN	Pollutant	Potential-to-Emit Annual Emission Rate	Proposed Annual Emission Rate
		(tpy)	(tpy)
WS	HCI/HAP	18.86	90:0
FUG	HCI/HAP	1.53	1.53
	PM	0.19	0.19
RD-1	PM ₁₀	0.04	0.04
	PM _{2.5}	0.01	0.01

Notes:

Proposed Annual Emission Rate is conservatively based on 100% of the proposed annual throughput being handled by rail-to-truck operations.

EPN = Emission Point Number

HAP = Hazardous Air Pollutants

HCI = Hydrochloric Acid

PM = Particulate Matter

PM₁₀ = PM with a diameter of 10 microns and smaller

 $PM_{2.5}$ = PM with a diameter of 2.5 microns and smaller

Univar USA, Inc. - Albuquerque Facility Hydrochloric Acid Emission Calculations

WORST CASE - 8,760 Hours per Year

Uncontrolled Truck Loading Emissions

	PTE Annual Emission Rate (tpy)	18.86
	Hours of Operation (hr/yr)	8,760
	PTE Short-term Emissions Rate (Lunax)	4.30
	Max Filling Rate (FR _M) (gal/hr)	4,200
	Emission Factor (L.) (lb/1000 gal)	1.0250
	Vapor Molecular Weight (M) (Ib/Ib-mole) (I	
	Liquid Composition (%)	100%
	True Vapor Pressure (P) (psia)	2.00
	Pollutant Type	ΑI
	CAS	7647-01-0
	Chemical Name	HCI 37%
	Operation	Rail-to-Truck
	EPN	WS

Hours of Operation Notes

E Factor (lb/1000 gal) = 12.46 SPM/T

Rail-to-truck transloading produces the highest emission; therefore, PTE calculations are based on 100% throughput using rail-to-truck transloading. Assumes no physical limitations - All loading is continuous for every possible hour of the year.

S = Saturation Factor (AP-42) = 0.6 for truck, 0.5 for tote/drums

P = True Vapor Pressure of liquid loaded (psia)

T = Temperature of bulk liquid loaded (°R) = 530 °R or 70 °F M = Molecular Weight of vapors (lb/lb-mole)

PTE Short-Term Emission Rate (lb/hr) = Emission Factor (lb/1000 gal) * Max Filling Rate (gal/hr) / 1,000 (gal)

PTE Annual Emission Rate (tpy) = PTE Short-Term Emission Rate (lb/hr) * Hours of Operation (hr/yr)

Proposed Emission Rate

Controlled Truck Loading Emissions

olled ual n Rate	5	0.0622	18
Controlled Annual Emission Rate	(tpy)	90.0	0.05
Hours of Transloading Operation	(hr/yr)	2,890	2,890
Controlled Short-term Emissions Rate (Lumax)	(lb/hr)	0.04	0.04
Control	(%)	%66	%66
Max Filling Rate (FR,,,)	(gal/hr)	4,200	4,200
Emission Factor (L _L)	b/lb-mole) (lb/1000 gal)	1.0250	0.8541
Vapor Molecular Weight (M)	(elom-dl/dl)	36.25	36.25
Liquid	(%)	100%	100%
True Vapor Pressure (P)	(psia)	2.00	2.00
Pollutant Type		VI	ΙΑ
CAS		7647-01-0	7647-01-0
Chemical Name		HCI 37%	HCI 37%
Operation		Rail-to-Truck	Rail-to-Tote
EPN		3/4/	2

E Factor (lb/1000 gal) = 12.46 SPM/T

Unload time per load = 1.5 hours Hours of Operation Notes

Pre load setup time = 1.5 hours

Post load unhook time = 1.5 hours

S = Saturation Factor (AP-42) = 0.6 for truck, 0.5 for tote/drums

P = True Vapor Pressure of liquid loaded (psia)

M = Molecular Weight of vapors (lb/lb-mole)

T = Temperature of bulk liquid loaded (°R) = 530 °R or 70 °F

Time filling per truck load = 33% Total time per load = 4.5 hours

WORST CASE HOURS OF OPERATION = 8,760 hours * 33% = 2890 hours

Rail-to-truck transloading produces the highest emission; therefore, PTE calculations are based on 100% throughput using rail-to-truck transloading. Controlled Short-Term Emission Rate (Ib/hr) = Emission Factor (Ib/1000 gal) * Max Filling Rate (gal/hr) / 1,000 (gal) * (1 - Control Efficiency [%]) Controlled Annual Emission Rate (tpy) = Controlled Short-Term Emission Rate (lb/hr) * Hours of Transloading Operation (hr/yr)

EPN = Emission Point Number

HAP = Hazardous Air Pollutants

HCI = Hydrochloric Acid PTE = Potential to Emit

Univar USA, Inc. - Albuquerque Facility Hydrochloric Acid Fugitives

Equipment / Service	SOCMI w/out C2 Fugitive Emission Factor	Number of Components	Hours of Operation	Uncontrolled Hourly Emission Rate	Uncontrolled Annual Emissions Rate
	(Ib/hr)		(hr/yr)	(lb/hr)	(tpy)
Valves	20				
Gas/Vapor	0.01316	0	8760	0.0000	0.0000
Light Liquid	0.00888	10	8760	0.0888	0.3889
Heavy Liquid	0.00051	0	8760	0.0000	0.0000
Pumps					
Light Liquid	0.04407	5	8760	0.2204	0.9651
Heavy Liquid	0.019	0	8760	0.0000	0.0000
Flanges					
All	0.00403	10	8760	0.0403	0.1765
Compressors	0.5027		8760	0.0000	0.0000
Relief Valves	0.2293		8760	0.000	0.0000
Open-Ended Lines	0.00375		8760	0.000	0.0000
Sampling Connections	0.0331		8760	0.0000	0.0000
Total				0.3495	1.5306

Pollutants	Emission Rates (Ib/hr)
Total Hourly IAs:	0.3495
Total Hourly HAPs:	0.3495

Pollutants	Emission Rates (tpy)
otal Annual IAs:	1.5306
otal Annual HAPs:	1.5306

Notes:

Emission factors are from U.S. Envrionmental Protection Agency AP-42, Protocol for Equipment Leak Emission Estimates, Table 2-1, November 1995.

Component counts are estimated.

Total emissions assumes that liquid is in the lines and pumps 8760 hr/yr; therefore, emissions estimates are conservative.

Total HAP emissions conservatively assume that 30% the fugitive emissions will be in the form of HAPs. This estimation is based on the current HAP content of the storage tanks at the site.

Definitions:

HAP IA

Hazardous Air Pollutant
 Inorganic Acid

Univar USA, Inc. - Albuquerque Facility Road Emissions Calculations

Pollutant	Particle Size Multiplier (k)	Road Surface Silt Loading (sL)	Mean Vehicle Weight (W)	Emperical Constant (a)	Emperical Constant (b)	Emission Factor (E)	Emission Factor (E)
	(g/VKT)	(g/m²)	(tons)			(g/VKT)	(Ib/VMT)
Md	3.23	8	40.00	0.91	1.02	303.43	1.077
PM ₁₀	0.62	е	40.00	0.91	1.02	58.24	0.207
PM _{2.5}	0.15	3	40.00	0.91	1.02	14.09	0.050

EPN	Pollutant	In-Plant Travel Distance	Traffic	Vehicle Miles Traveled per Hour	ш	Short-Term Emission Rate	Annual Emission Rate
		(miles)	(trucks/hr)	(VMT/hr)	(Ib/VMT)	(lbs/hr)	(tpy)
1	PM	0.25	1.00	0.25	1.077	0.269	0.19
RD-1	PM ₁₀	0.25	1.00	0.25	0.207	0.052	0.04
	PM _{2.6}	0.25	1.00	0.25	0.050	0.012	0.01

EPN = Emission Point Number

PM = Particulate Matter

PM₁₀ = PM with a diameter of 10 microns and smaller

 $PM_{2.6}$ = PM with a diameter of 2.5 microns and smaller

VMT = Vehicle Mile Traveled

Empirical Constant (sL.) in the emission calculations use the mean construction site silt content from U.S. Environmental Protection Agency AP 42 Table 13.2.2-1.

Empirical constant (k) values were taken from U.S Environmental Protection Agency AP 42 Table 13.2.1-1.

Worst-Case Tank Truck Weight is based on the maximum legal weight for tanker trucks on on federal highways as established by Title 23 of the Code of Federal Regulations Part 658.17(b).

Average annual day of rainfall in Albuquerque, New Mexico is 60 days. Average number of rainfall days was taken from AP 42 Figure 13.2.1-2.

VMT is assumed to be 0.25 miles roundtrip for each tank truck at the site.

Calculation Methodology:

Predictive Emissions Factor

 $E_{oxt} = [k * (sL)^{a}(W)^{b}] * (1-1.2*P/N)$

 $E_{\rm ext}$ = annual or other long-term average emission factor in the same units as k

sL = surface material silt content (%)

W = mean vehicle weight (tons)

a = constant PM factor for industrial roads

b = constant PM factor for industrial roads

P = number of hours with at least 0.254mm (0.01 in) of precipitation during the averaging period (P = 1,440 hrs)

N = Number of hours in the averaging period (N = 8,760 hrs)

Vehicle Miles Traveled per Hour (VMT/hr) = In-Plant Travel Distance (miles) * Traffic (trucks/hr)

Short-Term Emission Rate (lb/hr) = Vehicle Miles Traveled per Hour (VMT/hr) * E (lb/VMT)

Annaul Emission Rate (tpy) = Short-Term Emission Rate (lb/hr)* 1,440 (hr/yr) * 1/2,000 (ton/lb)



Univar USA Inc Safety Data Sheet

3075 Highland Pkwy, Ste 200, Downers Grove, IL 60515 (425) 889 3400

Emergency Assistance

For emergency assistance involving chemicals call Chemtrec - (800) 424-9300

SAFETY DATA SHEET

1. Identification

Product identifier

Hydrochloric Acid 37%

Other means of identification

Product code

Recommended use

Relevant identified uses: Chemical.

Recommended use: Raw material, Intermediate, initial product for chemical syntheses, process

chemical.

Recommended restrictions

None known

Manufacturer/Importer/Supplier/Distributor information

Manufacturer/Supplier Address

KMG Electronic Chemicals, Inc. 9555 W. Sam Houston Parkway South

Suite 600

Houston Texas 77099 US

Phone number

713-600-3800

Emergency telephone

3E Emergency Services

+1 866-706-3266 Access code: 333035

2. Hazard(s) identification

Physical hazards

Not classified.

Health Hazards

Skin corrosion/irritation

Category 1B

Category 1

Serious eye damage/eye irritation Specific Target Organ Toxicity, Single

Category 3 respiratory tract irritation

Exposure

OSHA defined hazards

Not classified.

Label elements



Signal word

Danger

Hazard statement

Causes severe skin burns and eye damage. May cause respiratory irritation.

Precautionary statement

Prevention

Use only outdoors or in a well-ventilated area. Do not breathe mist or vapor. Wear protective gloves/protective clothing/eye protection/face protection. Wash thoroughly after handling.

Response

If swallowed: Rinse mouth. Do NOT induce vomiting. If on skin (or hair): Take off immediately all contaminated clothing. Rinse skin with water/shower. Wash contaminated clothing before reuse. If in eyes: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing. If inhaled: Remove person to fresh air and keep comfortable for breathing. Immediately call a poison center/doctor.

Storage

Store in a well-ventilated place. Keep container tightly closed. Store locked up.

Disposal

Dispose of contents/container in accordance with local/regional/national/international regulations.

Hazard(s) not otherwise classified (HNOC)

Not classified.

3. Composition/information on ingredients

Substances

Chemical name	Common name and synonyms	CAS number	%
Hydrochloric acid		7647-01-0	37

Hydrochloric Acid 37%

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Composition comments

All concentrations are in percent by weight unless ingredient is a gas. Gas concentrations are in percent by volume.

4. First-aid measures

Inhalation

Immediately remove from further exposure. Get immediate medical assistance. For those providing assistance, avoid exposure to yourself or others. Use adequate respiratory protection. Give supplemental oxygen, if available. If breathing has stopped, assist ventilation with a mechanical device.

Skin contact

Flush thoroughly with water for at least 15 minutes. Remove contaminated clothes and rinse skin thoroughly with water. Get medical attention immediately. Chemical burns must be treated by a physician.

Eye contact

Flush thoroughly with water for at least 15 minutes. Get immediate medical assistance. If medical assistance is not immediately available, flush an additional 15 minutes. Make sure to remove any contact lenses from the eyes before rinsing.

Ingestion

Rinse mouth thoroughly with water and give large amounts of milk or water to people not unconscious. Do not induce vomiting. If vomiting occurs, the head should be kept low so that stomach vomit doesn't enter the lungs. Obtain medical attention and take along this material safety data sheet.

Most important symptoms/effects, acute and delayed

Corrosive. Prolonged contact causes serious eye and tissue damage. May cause serious chemical burns to the skin. May cause burns in mucous membranes, throat, esophagus and stomach.

Indication of immediate medical attention and special Treat symptomatically.

treatment needed General information

In case of shortness of breath, give oxygen. If the heart has stopped, trained personnel should begin cardiopulmonary resuscitation immediately. Ensure that medical personnel are aware of the material(s) involved, and take precautions to protect themselves. Keep victim warm. In case of accident or if you feel unwell, seek medical advice immediately (show the label where possible).

5. Fire-fighting measures

Suitable extinguishing media Unsuitable extinguishing media

This product is not flammable. Use extinguishing agent suitable for type of surrounding fire. None known.

Specific hazards arising from the chemical

By heating and fire, toxic and corrosive vapors/gases may be formed.

Special protective equipment and precautions for firefighters

Selection of respiratory protection for firefighting: follow the general fire precautions indicated in the workplace. Self-contained breathing apparatus and full protective clothing must be worn in case of fire

Fire fighting equipment/instructions Use water spray to cool unopened containers. Cool containers with flooding quantities of water until well after fire is out. Prevent runoff from fire control or dilution from entering streams, sewers, or drinking water supply.

General fire hazards

The product is not flammable.

6. Accidental release measures

Personal precautions. protective equipment and emergency procedures

Local authorities should be advised if significant spillages cannot be contained. Ensure adequate ventilation. Keep people away from and upwind of spill/leak. Do not touch damaged containers or spilled material unless wearing appropriate protective clothing. Ventilate closed spaces before entering them. Keep unnecessary personnel away. Stay upwind. Keep out of low areas. Use personal protection as recommended in Section 8 of the SDS.

Methods and materials for containment and cleaning up Should not be released into the environment. Prevent entry into waterways, sewers, basements or confined areas. Stop the flow of material, if this is without risk.

Large Spills: Dike far ahead of liquid spill for later disposal. Use a non-combustible material like vermiculite, sand or earth to soak up the product and place into a container for later disposal.

Small Spills: Absorb spill with vermiculite or other inert material. Clean contaminated surface thoroughly. After removal flush contaminated area thoroughly with water.

Never return spills in original containers for re-use.

Environmental precautions

Prevent further leakage or spillage if safe to do so.

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7. Handling and storage

Precautions for safe handling Handle and open container with care. Use only with adequate ventilation. Avoid any exposure.

Wash thoroughly after handling. Use Personal Protective Equipment recommended in section 8 of

the SDS

Conditions for safe storage, including any incompatibilities

Keep containers tightly closed in a dry, cool and well-ventilated place. Do not store together with sodium hypochlorite. Keep this material away from food, drink and animal feed. Protect from sunlight. Store away from incompatible materials. Use care in handling/storage.

8. Exposure controls/personal protection

Occupational exposure limits

US. OSHA Table Z-1 Limits for Air Contaminants (29 CFR 1910.1000)

Material	Туре	Value
Hydrochloric acid (CAS 7647-01-0)	Ceiling	7 mg/m3
		5 ppm

US. ACGIH Threshold Limit Values

Material	Туре	Value	
Hydrochloric acid (CAS 7647-01-0)	Ceiling	2 ppm	

US. NIOSH: Pocket Guide to Chemical Hazards

Material	Туре	Value	
Hydrochloric acid (CAS 7647-01-0)	Ceiling	7 mg/m3	
7017 01 0)		5 nnm	

Biological limit values

No biological exposure limits noted for the ingredient(s).

Appropriate engineering controls

Use process enclosures, local exhaust ventilation, or other engineering controls to control airborne levels below recommended exposure limits. Eye wash facilities and emergency shower must be

available when handling this product.

Individual protection measures, such as personal protective equipment

Eye/face protection Wear chemical goggles and face shield.

Skin protection

Hand protection Wear protective gloves. Be aware that the liquid may penetrate the gloves. Frequent change is

advisable. Suitable gloves can be recommended by the glove supplier.

Other Wear appropriate chemical resistant clothing.

Respiratory protection In case of inadequate ventilation use suitable respirator. Suitable respiratory protection for higher

concentrations or long-term effect: Self-contained breathing apparatus.

Thermal hazards When material is heated, wear gloves to protect against thermal burns.

General hygiene considerations

When using, do not eat, drink or smoke. Do not get in eyes. Do not get this material in contact with skin. Do not get this material on clothing. Remove and isolate contaminated clothing and shoes. Wash hands before breaks and immediately after handling the product. Handle in accordance with good industrial hygiene and safety practice. Launder contaminated clothing before reuse.

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9. Physical and chemical properties

Appearance	Colorless liquid.

Liquid. Physical state Form Liquid. Color Colorless. Odor Pungent. **Odor threshold** Not available. < 1 pΗ Melting point/freezing point Not available. Flash point Not available. **Evaporation rate** Not available. Not available. Flammability (solid, gas)

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Upper/lower flammability or explosive limits

Flammability limit - lower

Not available.

(%)

Flammability limit - upper

Not available.

(%)

Explosive limit - lower (%)

Not available.

Explosive limit - upper (%)

Not available.

Vapor density

1.3 (Air = 1)

Relative density

0.198

Solubility(ies)

Solubility (water)

Completely soluble

Partition coefficient

No data available.

(n-octanol/water)

Auto-ignition temperature

Not available.

Decomposition temperature

Not available.

Viscosity

Not available.

Other information

Density

1.20 g/cm3

Molecular formula

CI-H

Molecular weight

36.46 g/mol

10. Stability and reactivity

Reactivity

The product is stable and non-reactive under normal conditions of use, storage and transport.

Chemical stability

Material is stable under normal conditions. Hazardous polymerization does not occur.

Possibility of hazardous

reactions Conditions to avoid

High temperatures.

Incompatible materials

Strong oxidizing agents. Bases. Fluorine. Metals. Alkali metals. Amines. Reducing agents.

Hazardous decomposition

Hydrogen chloride gas. Chlorine dioxide.

products

11. Toxicological information

Information on likely routes of exposure

Inhalation

Irritating to respiratory system.

Skin contact

Causes skin burns. Causes eye burns.

Eye contact Ingestion

Causes digestive tract burns.

Symptoms related to the physical, chemical and

toxicological characteristics

Permanent eye damage including blindness could result. Causes permanent skin damage (scarring). May cause burns in mucous membranes, throat, esophagus and stomach.

Information on toxicological effects

Acute toxicity

Causes severe skin burns and eye damage. May cause respiratory irritation.

Product

Species

Test Results

Hydrochloric acid (CAS 7647-01-0)

Acute

Oral

LD50

Rabbit

900 mg/kg

Skin corrosion/irritation

Causes severe skin burns.

Serious eye damage/eye

Causes severe eye damage.

irritation

Respiratory or skin sensitization

Respiratory sensitization

No data available.

Skin sensitization

Not a skin sensitizer.

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Germ cell mutagenicity

No data available.

Carcinogenicity

Not classified.

IARC Monographs. Overall Evaluation of Carcinogenicity

Hydrochloric acid (CAS 7647-01-0)

3 Not classifiable as to carcinogenicity to humans.

OSHA Specifically Regulated Substances (29 CFR 1910.1001-1050)

Not listed

Reproductive toxicity

No data available.

Specific target organ toxicity -

May cause respiratory irritation.

single exposure

Specific target organ toxicity -

None known.

repeated exposure

Aspiration hazard

Not classified

Chronic effects

High concentrations: Inhalation causes dental erosion and may cause delayed pulmonary edema.

Further information

High concentrations: Inhalation causes dental erosion and may cause delayed pulmonary edema.

12. Ecological information

Ecotoxicity

The product components are not classified as environmentally hazardous. However, this does not exclude the possibility that large or frequent spills can have a harmful or damaging effect on the environment.

Product **Test Results Species** Hydrochloric acid (CAS 7647-01-0) Aquatic Fish LC50 Bluegill (Lepomis macrochirus) 3.25 - 3.5 mg/l, 96 hours Persistence and degradability No data available. Bioaccumulative potential No data available. Mobility in soil No data available. The product is water soluble and may spread in water systems. Mobility in general

13. Disposal considerations

Disposal instructions

Other adverse effects

Dispose of this material and its container at hazardous or special waste collection point. Do not allow this material to drain into sewers/water supplies. Dispose in accordance with all applicable regulations.

The product may affect the acidity (pH-factor) in water with risk of harmful effects to aquatic

Local disposal regulations

Dispose of in accordance with local regulations.

organisms. No data available.

Hazardous waste code

D002: Waste Corrosive material [pH <=2 or =>12.5, or corrosive to steel]

Waste from residues / unused

products

Dispose of in accordance with local regulations. Empty containers or liners may retain some product residues. This material and its container must be disposed of in a safe manner (see: Disposal instructions).

Contaminated packaging

Since emptied containers retain product residue, follow label warnings even after container is emptied.

14. Transport information

DOT

UN number UN1789

UN proper shipping name

Transport hazard class(es)

Hydrochloric acid

Class 8 Subsidiary risk 8 Label(s) Packing group II

Special precautions for user Read safety instructions, SDS and emergency procedures before handling.

Special provisions A3, A6, B3, B15, IB2, N41, T8, TP2, TP12

Packaging exceptions 154 Packaging non bulk 202 Packaging bulk 242 **ERG** number 157

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IATA

UN number

UN1789

UN proper shipping name

Hydrochloric acid

Transport hazard class(es)

Class

8 _

Subsidiary risk Packing group

II

Environmental hazards

No.

ERG Code

8L

Special precautions for user Read safety instructions, SDS and emergency procedures before handling.

IMDG

UN number

UN1789

UN proper shipping name

HYDROCHLORIC ACID

Transport hazard class(es)

Class

8

Subsidiary risk

Packing group

П

Environmental hazards Marine pollutant

No

EmS

F-A, S-B

Transport in bulk according to

Special precautions for user Read safety instructions, SDS and emergency procedures before handling. This substance/mixture is not intended to be transported in bulk.

Annex II of MARPOL 73/78 and

the IBC Code

15. Regulatory information

US federal regulations

This product is a "Hazardous Chemical" as defined by the OSHA Hazard Communication

Standard, 29 CFR 1910.1200.

TSCA Section 12(b) Export Notification (40 CFR 707, Subpt. D)

OSHA Specifically Regulated Substances (29 CFR 1910.1001-1050)

CERCLA Hazardous Substance List (40 CFR 302.4)

Hydrochloric acid (CAS 7647-01-0)

LISTED

Superfund Amendments and Reauthorization Act of 1986 (SARA)

Hazard categories

Immediate Hazard - Yes Delayed Hazard - Yes Fire Hazard - No Pressure Hazard - No Reactivity Hazard - No

SARA 302 Extremely hazardous substance

Chemical name

CAS number

Reportable **Threshold**

quantity

5000

Threshold

Threshold

planning quantity

planning quantity, planning quantity, lower value upper value

Hydrochloric acid

7647-01-0

500 lbs

SARA 311/312 Hazardous

chemical

Yes

SARA 313 (TRI reporting)

Chemical name

CAS number

% by wt.

Hydrochloric acid

7647-01-0

37

Other federal regulations

Clean Air Act (CAA) Section 112 Hazardous Air Pollutants (HAPs) List

Hydrochloric acid (CAS 7647-01-0)

Clean Air Act (CAA) Section 112(r) Accidental Release Prevention (40 CFR 68.130)

Hydrochloric acid (CAS 7647-01-0)

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Clean Water Act (CWA) Section 112(r) (40 CFR Hazardous substance

68.130)

Safe Drinking Water Act

Not regulated.

(SDWA)

Drug Enforcement Administration (DEA). List 2, Essential Chemicals (21 CFR 1310.02(b) and 1310.04(f)(2) and Chemical Code Number

Hydrochloric acid (CAS 7647-01-0)

6545

Drug Enforcement Administration (DEA). List 1 & 2 Exempt Chemical Mixtures (21 CFR 1310.12(c))

Hydrochloric acid (CAS 7647-01-0)

20 %WV

DEA Exempt Chemical Mixtures Code Number

Hydrochloric acid (CAS 7647-01-0)

6545

US state regulations

This product does not contain a chemical known to the State of California to cause cancer, birth

On inventory (yes/no)*

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defects or other reproductive harm.

US. Massachusetts RTK - Substance List

Hydrochloric acid (CAS 7647-01-0)

US. New Jersey Worker and Community Right-to-Know Act

Hydrochloric acid (CAS 7647-01-0)

US. Pennsylvania Worker and Community Right-to-Know Law

Inventory name

Hydrochloric acid (CAS 7647-01-0)

US. Rhode Island RTK

Hydrochloric acid (CAS 7647-01-0)

US. California Proposition 65

US - California Proposition 65 - Carcinogens & Reproductive Toxicity (CRT): Listed substance Not listed.

International Inventories

Country(s) or region

Australia	Australian Inventory of Chemical Substances (AICS)	Yes
Canada	Domestic Substances List (DSL)	Yes
Canada	Non-Domestic Substances List (NDSL)	No
China	Inventory of Existing Chemical Substances in China (IECSC)	Yes
Europe	European Inventory of Existing Commercial Chemical Substances (EINECS)	Yes
Europe	European List of Notified Chemical Substances (ELINCS)	No
Japan	Inventory of Existing and New Chemical Substances (ENCS)	Yes
Korea	Existing Chemicals List (ECL)	Yes
New Zealand	New Zealand Inventory	Yes
Philippines	Philippine Inventory of Chemicals and Chemical Substances (PICCS)	Yes
United States & Puerto Rico	Toxic Substances Control Act (TSCA) Inventory	Yes

^{*}A "Yes" indicates this product complies with the inventory requirements administered by the governing country(s).

16. Other information, including date of preparation or last revision

Issue date21-September-2013Revision date21-October-2014

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Further information The mixture is classified based on test data for physical hazards. The classification for health and

environmental hazards is derived by a combination of calculation methods and test data, if

available. For details, refer to Sections 9, 11 and 12.

NFPA ratings



Hydrochloric Acid 37% SDS US

A "No" indicates that one or more components of the product are not listed or exempt from listing on the inventory administered by the governing country(s).

Disclaimer

This information is provided without warranty. The information is believed to be correct. This information should be used to make an independent determination of the methods to safeguard workers and the environment.

Univar USA Inc Safety Data Sheet

For Additional Information contact SDS Coordinator during business hours, Pacific time: (425) 889-3400

Notice

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Do not use ingredient information and/or ingredient percentages in this SDS as a product specification. For product specification information refer to a product specification sheet and/or a certificate of analysis. These can be obtained from your local Univar sales office.

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